

TOMPKINS, McGUIRE, WACHENFELD & BARRY, LLP

Counselors at Law

3 BECKER FARM ROAD, SUITE 402
ROSELAND, NEW JERSEY 07068-1726
Roseland (973) 622-3000
New York (212) 714-1720

James J. O'Hara
Partner

FAX (973)623-7780
www.tompkinsmcguire.com

Direct Line (973) 623-7041
johara@tompkinsmcguire.com

February 15, 2022

Via ECF

The Honorable Michael A. Hammer,
United States Magistrate Judge
Martin Luther King, Jr. Federal Building
And Courthouse, 2nd Floor
50 Walnut Street
Newark, New Jersey 07102

Re: *Bianchi v. Samsung Electronics America, Inc. et al.*
Civil Action No.: 2:17-cv-01263-CCC-MAM

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant Samsung Electronics America, Inc. ("SEA") in the above-referenced matter. Together with Plaintiffs' counsel, we are providing a joint status report in furtherance of the Court's Text Order of January 10, 2022.

As previously reported, a mediation with the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.) resulted in a Settlement Agreement. The parties continue to work jointly and propose updating the Court with our further progress in April 2022.

Respectfully,

/s/ James J O'Hara

JAMES J. O'HARA
On behalf of Defendant,
Samsung Electronics America, Inc.

Respectfully,

/s/ Kevin Laukaitis

KEVIN LAUKAITIS
On behalf of Plaintiffs

cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)

SO ORDERED

s/Michael A. Hammer
Michael A. Hammer, U.S.M.J.

Date: *2/16/2022*

*The parties shall submit an updated
joint status report on or before
April 1, 2022.*